

Timothy F. Nixon
GODFREY & KAHN, S.C.
780 North Water Street
Milwaukee, Wisconsin 53202
Telephone: (414) 273-3500
Facsimile: (414) 273-5198

Attorneys for Fee Examiner

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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	:	
In re:	:	Chapter 11
	:	
MOTORS LIQUIDATION COMPANY, <i>et al.</i> ,	:	Case No. 09-50026
f/k/a General Motors Corp., <i>et al.</i> ,	:	(Jointly Administered)
	:	
Debtors.	:	Honorable Robert E. Gerber
	:	
-----	X	

**AFFIDAVIT AND SUPPLEMENTAL DISCLOSURE STATEMENT ON
BEHALF OF TIMOTHY F. NIXON WITH RESPECT TO
GODFREY & KAHN, S.C., COUNSEL TO THE FEE EXAMINER**

STATE OF WISCONSIN)
) SS.
COUNTY OF DANE)

Timothy F. Nixon, being duly sworn and on oath, states that:

1. I practice law as a shareholder and member of the board of directors of Godfrey & Kahn, S.C. ("**Godfrey & Kahn**"), a law firm with its principal offices at 780 North Water Street in Milwaukee, Wisconsin, and One East Main Street, in Madison, Wisconsin, other offices in Wisconsin, and in Washington, D.C.

2. Except as otherwise noted, I have personal knowledge of the matters set forth herein and, if called as a witness, would testify competently thereto.

3. On January 5, 2010, I executed my original declaration (the “**Original Declaration**”) in support of the application (the “**Application**”), dated January 5, 2010, of Brady C. Williamson, Fee Examiner, for entry of an order authorizing him to employ and retain Godfrey & Kahn as his counsel under the terms and conditions set forth in the Application. Both documents are incorporated herein by reference.

4. On January 19, 2010, this Court entered an order approving the Application.

5. In the Original Declaration, I disclosed that Godfrey & Kahn had not been retained by the Debtors or any committee in this proceeding, nor did it represent any entity on the list of Retained Professionals. In the interests of full disclosure, however, I additionally disclosed that it had co-counsel and local counsel relationships with entities on the Retained Professionals list, such as Jenner & Block and Jones Day.

6. On or about October 27, 2010, Godfrey & Kahn was retained by Apple, Inc. to serve as local counsel in the prosecution of two patent infringement cases against Motorola, Inc. and Motorola Mobility, Inc. *Apple, Inc. v. Motorola, Inc., et al.*, Case No. 10-CV-662 (W.D. Wis.); *Apple, Inc. v. Motorola, Inc., et al.*, Case No. 10-CV-661 (W.D. Wis.). The lead counsel in those cases is Weil, Gotshal & Manges LLP.

7. On or about June 2, 2010, Godfrey & Kahn was retained by Auto-Wares LLC in a suit currently pending in the District Court for the Western District of Michigan. *Auto-Wares, LLC v. Wisconsin River Co-Op Svcs.*, Case No. 09-CV-702

(W.D. Mich.). Honigman Miller Schwartz and Cohn LLP are co-counsel to Godfrey & Kahn in that case.

8. On or about May 12, 2010, Godfrey & Kahn was retained by Formax, Inc. and Provisur Technologies Inc. in a patent infringement case in the District Court for the Eastern District of Wisconsin. *Patriot Universal Holdings, LLC et al. v. Formax, Inc. et al.*, No. 10-CV-355 (E.D. Wis.). The lead counsel in that case is Jenner & Block LLP.

Dated this 16th day of November, 2010.

/s/ Timothy F. Nixon

Timothy F. Nixon
780 North Water Street
Milwaukee, Wisconsin 53202
Telephone: (414) 273-3500
Facsimile: (414) 273-5198
E-mail: tnixon@gklaw.com

Subscribed and sworn to before me
this 16th day of November, 2010.

/s/ Zerithea Gale Raiche

Zerithea Gale Raiche
Notary Public, State of Wisconsin
My Commission Expires: June 9, 2013.

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